

**JOHN S. WALLENSTEIN**  
**Attorney at Law**  
**1100 Franklin Avenue**  
**Garden City, New York 11530**  
**(516) 742-5600 Fax (516)742-5040**  
**email: jswallensteinesq@aol.com**

March 2, 2012

**VIA ECF**

Hon. Sandra L. Townes  
United States District Court, EDNY  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Bombino, *et al*  
Indictment # 10 CR 147 (S-4) (SLT)

Dear Judge Townes;

As the Court is aware, I represent Defendant Alicia DiMichele in the captioned Indictment. I am writing in response to the Government's motion (ECF Document #379) for an anonymous and sequestered jury upon the trial of this Indictment.

The Court has previously granted Ms. DiMichele's severance motion, and thus she will be tried separately. The Government's instant motion makes no mention of Ms. DiMichele at all, and does not connect her in any way with the alleged conduct forming the basis of the application; indeed, it could not do so. I have spoken with AUSA Allon Lifschitz, and it is my understanding that, in connection with Ms. DiMichele's trial, the Government will not seek an anonymous jury, nor seek to sequester the panel. Therefore, we take no position with respect to the pending motion. Should the Government's position *vis-à-vis* the jury for Ms. DiMichele's trial change, we will respond appropriately at that time.

Thank you for your courtesy and consideration.

Respectfully yours,

**/s/ JOHN S. WALLENSTEIN**

JOHN S. WALLENSTEIN

JSW/hs

cc: AUSA Nicole Argentieri (by ECF)  
AUSA Rachel Nash (by ECF)  
AUSA Allon Lifschitz (by ECF)  
All defense counsel (by ECF)